



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF CRIMINAL ENFORCEMENT, FORENSICS AND TRAINING
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
P.O. BOX 25227, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

July 13, 2014

FACSIMILE/E-MAIL and HAND DELIVERED

Shirley Yap
General Manager
Puget Sound Refinery
Shell Oil Products, U.S.
PO Box 622
Anacortes, Washington 98221

Re: Clean Air Act 112(r) and Resource Conservation and Recovery Act Compliance Inspection
at Puget Sound Refinery

Dear Ms. Yap:

The U.S. Environmental Protection Agency (EPA) National Enforcement Investigations Center (NEIC), will conduct an inspection to assess compliance with requirements under the Clean Air Act (CAA) 112(r) and the Resource Conservation and Recovery Act (RCRA) of the Puget Sound Refinery beginning August 10, 2015. The inspection, and the enclosed document request, is authorized pursuant to EPA regulations and Federal environmental statutes, including but not limited to:

- Section 114 (a) of the Clean Air Act, 42 U.S.C. § 7414 (a); and,
- Section 3007 (a) and 9005 (a) of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6927 (a) and 6991 (a).

The purpose of the inspection is to determine compliance with applicable environmental statutes, regulations, rules, decrees, approvals, and permits. We believe that many of the requested records and documents needed by our EPA inspectors are, or should be, readily available at your facility.

As a standard procedure under CAA 112(r), EPA requires that employee representatives be provided the opportunity to participate in the entire inspection. Please notify the appropriate employee representatives of the dates and times of the inspection and extend our invitation to join us. A copy of this letter must be provided to the employee representatives.

You may, if you desire, assert a confidentiality claim covering part of or all of the

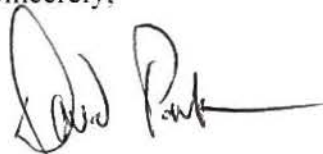
information requested, pursuant to 40 CFR § 2.203(b), by attaching to such information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as trade secret or proprietary or company confidential. Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in the regulations at 40 CFR Part 2 Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. In any event, you should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Notice is hereby given, pursuant to 40 CFR §§ 2.301(h) and 2.310(h), that EPA may disclose confidential information provided by Shell to EPA's authorized representatives, including its contractors, Eastern Research Group ("ERG"). Confidential information may be disclosed to EPA's authorized representatives for the following reasons: to assist with document handling, inventory and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 CFR §§ 2.301(h) and 2.310(h), Shell may submit, along with its response to this Information Request, any comments regarding EPA's disclosure of confidential information to its authorized representatives.

If you have questions about this inspection, please contact Trent Rainey, P.E., NEIC project manager at (303) 462-9308.

We thank you in advance for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "David Parker", with a long horizontal flourish extending to the right.

David Parker
Civil Program Coordinator, NEIC

Enclosure